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Robert M. Isackson
PARTNER

June 17, 2024

VIA ECF

The Honorable Philip M. Halpern
United States District Judge, Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: Mirrorlite Mirror, Inc. v. Glassless Mirror Manufacturers Inc., No.: 7:23-cv-03437-PMH

Dear Judge Halpern:

Pursuant to Rule 5.B of Your Honor's Individual Rules of Practice, Defendant Glassless Mirror Manufacturers, Inc. respectfully requests approval to redact and file under seal portions of Defendant's Statement of Material Facts Pursuant to Rule 56.1 and Plaintiff's Responses Thereto. The Statement of Material Facts contains confidential information designated as Highly Confidential – Attorneys' Eyes Only by each Plaintiff and Defendant pursuant to the Stipulated Confidentiality Agreement and Protective Order (Dkt. 40).

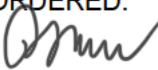
The Court has discretion in determining whether good cause exists to overcome the presumption of open access to documents filed. *See, e.g., G* Application granted with respect to Defendant's proposed redactions which it has highlighted in yellow. With respect to that which Plaintiff designated, highlighted by Defendant in green, the Court will provisionally seal such information subject to Plaintiff, by June 24, 2024 at 5:00 p.m., filing a letter explaining the reasons for maintaining that information under seal in accordance with Rule 5(B) of this Court's Individual Practices.

presumption of access may be outweighed by the need to protect confidential business information that could harm a competitive advantage. *See, e.g., G & Co., Inc.* 2020 WL 6781222, at *3. The redacted document (Doc. 57) shall remain the publicly-filed version, and the unredacted version (Doc. 56) shall remain under seal, as indicated herein.

The Clerk of Court is respectfully directed to terminate the letter motion pending at Doc. 55.

Gusa S/A v. AMCI Holdings, Inc., 2023 WL 1000000, at *3. SO ORDERED.

Defendant's proposed redaction of Plaintiff's marketing strategy and marketing spend information is requested.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 18, 2024

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designated material (in green highlighting) on May 31, however, Plaintiff has not responded. Defendant has maintained the designations Plaintiff identified during discovery.

In accordance with the Court's Individual Rules of Practice, Defendant will publicly file the Statement of Facts with proposed redactions and file under seal the Statement of facts with the redactions highlighted.

We appreciate the Court's consideration.

Respectfully submitted,



Robert M. Isackson

cc: All counsel of record (via ECF)